

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MATTHEW BOROWSKI,

Plaintiff,

v.

23-cv-257

CUSTOMS AND BORDER PROTECTION,

Defendant.

DECLARATION

MARY K. ROACH, makes this declaration under penalties of perjury, pursuant to 28 U.S.C. Section 1746:

1. I am an attorney duly licensed to practice in the State of New York and before this Court, and I am an Assistant United States Attorney in the Western District of New York.
2. I represent Defendant Customs and Border Protection in this action.
3. The Administrative Record filed in this action (“AR”) includes personally identifiable information relating to Plaintiff Matthew Borowski, including his addresses, telephone numbers, document numbers, license plate numbers, and his date of birth (“Plaintiff’s PII”).
4. Plaintiff’s PII has been redacted from the AR and these redactions have been applied in blue.
5. The AR also contains redactions of information which is protected by the deliberative process privilege, information consisting of law enforcement sensitive techniques and procedures and the personally identifiable information of CBP personnel, and third parties. These redactions have been applied in black.

6. A copy of the AR without Plaintiff's PII redacted has been mailed to Plaintiff by regular mail.

DATED: Buffalo, New York, May 15, 2024

S/MARY K. ROACH
Assistant U.S. Attorney